February 21, 2024

VIA ECF

The Honorable Mary Kay Vyskocil United States District Court Southern District of New York 500 Pearl Street, Room 2230 New York, NY 10007

Re: Update re Preferred ADR Method in Broidy, et al. v. Global Risk Advisors, et al.,

Case No. 19-cv-11861

Dear Judge Vyskocil:

The parties in the above-referenced action respectfully submit this joint letter pursuant to the Court's January 26, 2024 Civil Case Management Plan and Scheduling Order (ECF 212), which provides that "[t]he parties shall confer about a preferred ADR approach and report back to the Court within 30 days," and paragraph 12(b) and (c) of this Court's standard scheduling order.

Counsel for the parties have discussed alternative dispute resolution mechanisms and propose a settlement conference before a Magistrate Judge. Counsel for the parties recommend that the settlement conference be held after the close of fact discovery, if appropriate at that time.

Respectfully submitted,

/s/ Paul J. Burgo

Daniel R. Benson Paul J. Burgo Kasowitz Benson Torres LLP Counsel for Plaintiffs /s/ Marc A. Weinstein

Marc A. Weinstein Amina Hassan Kiran Rosenkilde Hughes Hubbard & Reed LLP Counsel for Defendants